

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

|                                    |   |   |
|------------------------------------|---|---|
| In re:                             | ) | Chapter 11  |
|                                    | ) |   |
| W. R. GRACE & CO., <u>et al.</u> , | ) | Case No. 01-1139 (JKF)                                      |
|                                    | ) | Jointly Administered  |
| Debtors.                           | ) | Related Docket Nos. 11607, 11248, 11244, 11246<br>and 11247 |
|                                    |   | Re: Agenda Item No. 1                                       |
|                                    |   | <b>Hearing Date: December 19, 2005 at 12:00 p.m.</b>        |

**DEBTORS' MOTION FOR LEAVE TO FILE A REPLY IN FURTHER SUPPORT OF  
ITS NINTH MOTION FOR AN ORDER EXTENDING EXCLUSIVITY**

The Debtors hereby request authority, pursuant to Del.Bankr.LR 9006-1(d), to file a reply in further support of "*Debtors' Ninth Motion for an Order Pursuant to 11 U.S.C. § 1121(d) Extending Debtors' Exclusive Periods In Which To File A Chapter 11 Plan and To Solicit Votes Thereon*" (Docket No. 11607) (the "Motion").

On December 2, 2005, the Asbestos Personal Injury Committee, the Asbestos Property Damage Committee, the Future Claimants' Representative and a group of Asbestos Personal Injury Plaintiffs' Lawyers (the "Respondents") filed objections to the Motion (Docket Nos. 11248, 11244, 11246 and 11247) (the "Objections"). By the Objections, among other things, the Respondents take the opportunity to put on the record their formal positions regarding the Debtors' chapter 11 cases, strategy and plan progress. In doing so, the Respondents are less than candid with the Court with respect to the present posture of these cases and Respondents contradict each other. As a result, the Debtors seek to file a brief Reply to outline these points

and preview to the Court that they intend to set out the state of play in detail and focus on the challenges still ahead at the December 19, 2005 hearing on the Motion.


WHEREFORE, the Debtors respectfully request the entry of an Order granting it authority to file the Reply, which is attached hereto as Exhibit 1.

Dated: December 9, 2005

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and

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\_\_\_\_\_  
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Co-counsel for Debtors and Debtors in Possession

SO ORDERED this \_\_\_\_ day  
of October, 2005

\_\_\_\_\_  
The Honorable Judith K. Fitzgerald  
United States Bankruptcy Judge